

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA,
SOUTHERN DIVISION**

DARRYL ANDERSON, et al.,

Plaintiffs,

v.

PERDUE FARMS , INC.,

Defendant.

§
§
§
§
§
§
§
§
§
§

**CIVIL ACTION NO.
1:06-cv-01000-MEF-WC**

**CONSENT MOTION FOR EXTENSION OF TIME FOR
PLAINTIFFS AND DEFENDANT TO FILE THEIR
JOINT 26(f) REPORT**

Plaintiffs with the consent of Defendant in the above captioned case, and through its undersigned counsel, moves this Honorable Court for an extension of 5 days in which to file their joint 26(f) report.

1. The Plaintiffs were delayed but counsel for the parties conferred on March 20th and 21st.
2. The Parties joint 26(f) report is due March 21, 2007.
3. The Parties are currently working to complete the Planning Report and seek an extension to give each party a meaningful opportunity to review the proposals and confer as required by the Rule

4. Counsel for all parties has consented to Plaintiffs' request for a 5 day extension subject to the approval of this Court.
5. Should the requested extension be granted, the response of Plaintiffs will be due to be filed on or before March 28, 2007.
6. This action was filed on November 13, 2006.
7. Because this action is a collective action brought pursuant to the Fair Labor Standards Act, 29 U.S.C. §201 et seq., counsel is likely to resolve the issues made subject of this motion and since Defendants have consented to the requested 5 day extension, the granting of this extension should not unduly delay these proceedings.

WHEREFORE, premises considered, Plaintiffs request the Honorable Court Grant this Motion and allow the parties until March 28, 2007 to file joint planning report.

Dated: March 21, 2007

Respectfully submitted,

THE COCHRAN FIRM, P.C.

/s/ Robert J. Camp

ROBERT J. CAMP

BERNARD D. NOMBERG

505 North 20th Street, Suite 825

Birmingham, AL 35203
(205) 930-6900 (Phone)
(205) 930-6910 (Fax)

– and –

Lance H. Swanner
Samuel A. Cherry, Jr.
THE COCHRAN FIRM, P.C.
163 W. Main Street
P.O. Box 927
Dothan, AL 36302
(334) 793-1555 (Phone)
(334) 793-8280 (fax)

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2007, I electronically filed the foregoing Motion with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to:

jkelly@morganlewis.com

bliss@morganlewis.com

Sandra.reiss@odnss.com

/s/ Robert J. Camp
ROBERT J. CAMP